

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)

MELVIN NEWSOME, et al.

Plaintiffs,

v.

UP-TO-DATE LAUNDRY, INC., et al.

Defendants.

Civil Action No. S01-2257 (WDQ)

JOINT MOTION FOR PRELIMINARY APPROVAL OF CONSENT DECREE

The parties herein jointly request, pursuant to Paragraph 26 of the attached Consent Decree, that the Court give preliminary approval to the Decree, which the parties believe is fair, adequate and reasonable. Paragraph 28 of the Decree contemplates that the Fairness Hearing will take place about 120 days following preliminary approval, which should mean that the Fairness Hearing can take place in October 2004. This should permit sufficient time for final approval to be given by December 31, 2004, if the Court deems it appropriate. It is crucial that any final approval be given by that date (see Paragraphs 17 and 18).

The Consent Decree also contemplates that notice will be given to the class within 30 days of preliminary approval, and that the proposed Notice, Claim Form and Opt Out Form will be submitted to the Court for approval (see Paragraph 28). The date of the Fairness Hearing must be included in the Notice, and the parties plan to submit these materials to the Court for approval shortly after the Court gives preliminary approval to the Consent Decree and sets a date for the Fairness Hearing.

A proposed order is attached.

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